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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
v.)
)
MICHAEL EDISON,)
)
Defendant.)

Criminal No. CR 07-0074 WHA

**STIPULATION AND ~~PROPOSED~~
ORDER EXCLUDING TIME**

The above-captioned matter came before the Court on August 15, 2007. The defendant was represented by Michael Thorman, Esq., AND Roger Patton, Esq., and the government was represented by Jeffrey Finigan, Assistant United States Attorney. The matter was set before this Court on August 28, 2007, at 2:00 p.m. for further status and setting of motions.

In addition to the existing time exclusion already in place for this time period, the Court made a finding that the time from and including August 15, 2007, through and including August 28, 2007, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(8)(A), because

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the ends of justice served by taking such action outweighed the best interest of the public and the defendant in a speedy trial. The finding was based on the need for the defendant to have reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and for continuity of counsel pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv).

The parties hereby agree to and request that the case be continued until August 28, 2007, and that the exclusion of time until then be granted. The parties agree and stipulate that the additional time is appropriate and necessary under Title 18, United States Code, § 3161(h)(8)(A), because the ends of justice served by this continuance outweigh the best interest of the public and the defendant in a speedy trial. This time exclusion will allow defense counsel to effectively prepare, taking into account the exercise of due diligence, and will provide for continuity of counsel for the defendant.

DATED: August 20, 2007

/s/
MICHAEL THORMAN
Counsel for Michael Edison

DATED: August 20, 2007

/s/
ROGER PATTON
Counsel for Michael Edison

DATED: August 15, 2007

/s/
JEFFREY R. FINIGAN
Assistant U.S. Attorney

So ordered.

DATED: August 27, 2007

UNITED STATES DISTRICT COURT
IT IS SO ORDERED
Judge William Alsop
WILLIAM ALSOP
UNITED STATES DISTRICT COURT JUDGE